## **U.S. Department of Justice**



United States Attorney Eastern District of New York

LMN

F.#2009R02211

271 Cadman Plaza East Brooklyn, New York 11201

June 11, 2010

## By Federal Express

Peter Brill, Esq. Karasyk & Moschella, LLP 225 Broadway 32<sup>nd</sup> Floor New York, New York 10007

> Re: United States v. Oscar Sandino Criminal Docket No. 10-331 (VPP)

Dear Mr. Brill:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government provides the following additional discovery material to the above-captioned defendants. This production supplements the discovery previously provided to you. We reiterate our request for reciprocal discovery.

Please find enclosed the following items:

- (a) one compact disk containing: (i) a consensually monitored recording between the defendant and Jane Doe 1 on or about March 11, 2008. Also on the disk is an enhancement of that recording. The name and date of birth of Jane Doe 1 has been redacted from the recordings; and (ii) consensually monitored telephone calls between the defendant and Jane Doe 1. Also on the disk are enhancements of those telephone calls;
- (b) toll records for 646-269-4966 (Jane Doe 2's phone);
- (c) one compact disk containing toll records for 347-645-5595 (the defendant's phone).

If you have any questions or requests, please contact me.

Very truly yours,

LORETTA E. LYNCH United States Attorney Eastern District of New York

By: \_\_\_\_/s/\_\_\_ Pamela K. Chen Licha M. Nyiendo Assistant U.S. Attorneys (718) 254-7575/6350

## Enclosures

cc: Clerk of the Court (VPP)
(w/o enclosures)